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Attorneys for Plaintiffs

Additional Attorneys on Signature Page

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE META PIXEL TAX FILING CASES	Master File No. 5:22-cv-07557-PCP
This document relates to:	**DECLARATION OF NEAL DECKANT IN SUPPORT OF REPLY IN SUPPORT OF MOTION FOR CLASS CERTIFICATION**
All actions	
	Date: January 15, 2026
	Time: 10:00 a.m.
	Judge: Hon. P. Casey Pitts
	Date Action Filed: Dec. 1, 2022

DECKANT DECL. ISO CLASS CERTIFICATION REPLY BRIEF; CASE NO. 5:22-CV-07557-PCP

1   I, Neal Deckant, declare as follows:

2   1.   I am an attorney at law licensed to practice in the State of California. I am a

3   member of the bar of this Court, and I am a partner at Bursor & Fisher, P.A., counsel of record for

4   Plaintiffs in this matter. I have personal knowledge of the matters set forth herein, and if called

5   upon to do so, would and could testify competently thereto. I offer this declaration in support of

6   Plaintiffs' Reply in Support of Class Certification.

7   2.   In some instances, relevant portions of the materials listed below have been marked

8   by Plaintiffs in red boxes.

9   3.   Each document is being filed under seal pursuant to the operative protective order in

10   this case either because Meta designated cited portions as confidential or the document describes

11   information that Meta designated as confidential.

12   4.   Attached hereto as **Exhibit 1** is a true and correct copy of a March 7, 2025 letter

13   sent to Plaintiffs by Meta in this matter.

14   5.   Attached hereto as **Exhibit 2** is a true and correct copy of excerpts of the deposition

15   transcript of Meta's 30(b)(6) witness Amlesh Jayakumar, who was deposed in this matter on July

16   14, 2025.

17   6.   Attached hereto as **Exhibit 3** is a true and correct copy of excerpts of the deposition

18   transcript of Meta employee Tobias Wooldridge, who was deposed in this matter on April 28,

19   2025.

20   7.   Attached hereto as **Exhibit 4** is a true and correct copy of the Reply Report of

21   Robert Zeidman.

22   I declare under penalty of perjury that the foregoing is true and correct to the best of my

23   knowledge, information, and belief. Executed in Walnut Creek, California, on December 15, 2025.

24   */s/ Neal Deckant*
                                          Neal Deckant
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EXHIBIT 1

FILED UNDER
SEAL

EXHIBIT 2

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Page 1

1   UNITED STATES DISTRICT COURT
2   NORTHERN DISTRICT OF CALIFORNIA
3   SAN JOSE DIVISION
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  IN RE META PIXEL TAX

7   No. Master File No.

  FILING CASES   3:22-cv-07557-PCP

8

  This document relates
9 to: All actions
   _____/

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12
                    HIGHLY CONFIDENTIAL
13
          VIDEOTAPED DEPOSITION OF AMLESH JAYAKUMAR
14
               30(b)(6) Meta Platforms, Inc.
15
                       July 14, 2025
16
17
18
19
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21
22
       Taken before EARLY K. LANGLEY, RMR, B.A. (PBK)
23
                     CSR No. 3537
24
                  Job No. NE 7464368
25

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 1           And I want to direct your attention to
 2    the third page, and there's a fairly lengthy
 3    paragraph that starts on line 4 and ends on
 4    line 17.
 5           Do you see that?
 6        A.  Yes.
 7        Q.  Line 7 of page 3 of Exhibit 143
 8    describes a list of Event Data and parameters.
 9    And that list goes from roughly -- well, actually
10    line 6 through roughly line 12.
11           Do you see that?
12        A.  Yes.
13        Q.  How did Meta learn about the information
14    that's disclosed on page 3 of Exhibit 143?
15           MS. HAUSKNECHT:  Object to form.  Vague.
16           THE WITNESS:  Just to clarify, by how
17    does Meta -- how has Meta learned, are you
18    describing the admission as it's mentioned in
19    line 5 onwards with respect to the event and the
20    parameters listed here?
21    BY MR. SMITH:
22        Q.  Yeah.  How did it know what parameters
23    and events to list in its response there?
24        A.  In the ordinary course of business,
25    Event Data that is received or transmitted and
```

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1   then subsequently received by Meta from Meta

2   Pixels are primarily stored in certain off line

3   persistent storage systems that can be used in

4   determining potential Event Data that may have

5   been sent and then subsequently received by Meta

6   for certain Pixels.

7   Q.   And when you say "offline persistent

8   storage system," are you referring to HIVE?

9   A.   Yes.

10   Q.   Was the data found on a particular HIVE

11   table?

12   A.   ███████████████████████████████

13   ██

14   ███████████████████████   ███████████████████

15   ██

16   ██████████████████████████████████████

17   ███████████████████████████████████

18   ███████████████████████████████████████

19   ██

20   ████████████████

21   Q.   What are the names of the HIVE tables

22   where the information disclosed on page 3 were

23   obtained?

24   A.   The HIVE tables could -- relating to the

25   ███████████████████████████████████████ fic

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1 ██

2   A. ████████████████████████████████

3 ██████████████████████████████████ ███████████

4 ██

5 ███████

6   Q. I see. Okay. And what's the purpose of

7 recording that information?

8   A. ████████████████████████████████████

9 ██

10 ██

11 ████████████████████████████████████.

12   Q. Page 21, Exhibit 148. The last column

13 ██████████████████████████████████████

14 what's that a reference to?

15   MS. HAUSKNECHT: Objection. Outside the

16 scope.

17   THE WITNESS: I'm not familiar with how

18 it's generated, but it represents the -- if it

19 ██

20 ██████████████████████████████████████

21 ████████████████████████

22 BY MR. SMITH:

23   Q. ██████████████████████████████████████

24 using the website that triggered an event?

25   MS. HAUSKNECHT: Objection. Outside the

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 1   scope.
 2           THE WITNESS:  I'm -- I'm not certain.
 3   BY MR. SMITH:
 4       Q.  Do you know what Meta does with this
 5   information?
 6           MS. HAUSKNECHT:  Objection.  Outside the
 7   scope.
 8           THE WITNESS:  Not that I am aware, no.
 9   BY MR. SMITH:
10       Q.  Let's go to page 23.  There's just one
11   ███████████████████████████████████████
12           What's that all about?
13           MS. HAUSKNECHT:  Objection.  Scope.
14           THE WITNESS:  This represents the
15   ████████████████████████████████████████████
16   ██████████████████████████████████████
17   BY MR. SMITH:
18       Q.  ████████████████████
19           MS. HAUSKNECHT:  Objection.  Outside the
20   scope.
21           THE WITNESS:  Again, I'm not familiar
22   ██████████████████████████████████████████████
23   ███████████████████████████████████████████
24   ████████████████████████████████████████████████
25   ████████████████████████████████████████████
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EXHIBIT 3

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EXHIBIT 4

FILED UNDER SEAL